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September 6, 2023

HERBERT EISENBERG
LAURA S. SCHNELL

Honorable Sarah L. Cave
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

JULIAN R. BIRNBAUM
Of Counsel

RE: Charlotte Bennett v. Andrew M. Cuomo et al., 22 Civ. 07846 (VSB)(SLC)

Dear Judge Cave:

We represent Plaintiff Charlotte Bennett in this matter. We write jointly with Defendants Andrew Cuomo (“Cuomo”), Melissa DeRosa, Jill DesRosiers, and Judith Mogul (collectively, the “Parties”) pursuant to the Court’s August 22, 2023, Order, that the parties file a joint letter stating whether they have been able to agree on the scope of Cuomo’s (1) document subpoena directed toward Hamilton College and (2) deposition subpoenas directed toward John Doe and David Wippman, whether they are still negotiating or whether they are at an impasse.

The parties have met and conferred and have made significant progress in coming to an agreement. We anticipate being able to conclude these efforts and respectfully request that the Court grant us until Monday September 11, 2023 to file a joint letter as directed by the Court.

Respectfully Submitted,



Laura S. Schnell
Attorney for Charlotte Bennett

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